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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES  
ANTITRUST LITIGATION

Case No. 13-MD-02420 YGR (DMR)

MDL No. 2420

FURTHER SUPPLEMENTAL STATUS  
REPORT ON SETTLEMENT  
DISTRIBUTION

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

DATE ACTION FILED: Oct. 3, 2012

On March 17, 2023 (ECF No. 2763), Indirect Purchaser Plaintiffs (Plaintiffs) committed to filing an updated proposal for distribution with the Court by March 24, 2023. Plaintiffs now respectfully request an additional two weeks to file the plan, so that they may complete an audit of the various settlement accounts before presenting the distribution plan to the Court.

As the Court is aware, Plaintiffs reached settlements over time with multiple defendants. Those settlement proceeds have been, appropriately, segregated in different accounts with Citibank, which have accrued interest separately. Additionally, as the Court is aware, the proceeds must be allocated differently amongst the two different classes (Sony settlement class versus the more limited class that participates in all settlements) as well as between repealer and non-repealer states. While Plaintiffs have been working diligently to complete this process, tying out and triple-checking the numbers is taking more time than usual, due to the number of accounts and the complexity of the distribution.

Plaintiffs want to ensure that the numbers submitted with the distribution plan to the Court are final and take into account the complexities involved in the multiple settlements and distribution. Accordingly, Plaintiffs respectfully submit they will file the proposed plan of distribution on April 7, 2023.

DATED: March 24, 2023

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